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June 26, 2025

**By ECF**

Hon. Henry J. Ricardo  
United States Magistrate Judge  
U.S. District Court, Southern District of New York  
500 Pearl St.  
New York, NY 10007

*Re: Barnes v. Block et al., 22-cv-07236 (LTS) (HJR)*

Dear Judge Ricardo:

We represent Defendants Carson Block and Muddy Waters, LLC in the above-captioned case. We write to request a 30-day extension of Defendants' deadline to file an answer to the Complaint—from July 14, 2025 until August 13, 2025. In light of this request, we also respectfully request that the initial case management conference the Court scheduled for July 23, 2025 be adjourned until a date after Defendants file their Answer that is convenient for the Court. This is Defendants' first request for extensions of these deadlines. Plaintiff consents to extend Defendants' deadline to file an Answer by 14 days, but objects to the 30-day extension Defendants seek. Plaintiff objects to adjourning the initial case management conference.

On Monday, June 23, 2025, this Court granted in part and denied in part Defendants' motion to dismiss. ECF No. 41. Defendants were directed to file an answer to the Complaint within 21 days of the entry of the order: July 14, 2025. On Thursday, June 26, 2025, the Court scheduled a case management conference for July 23, 2025. Due to competing matters on Defendants' counsel's dockets and previously scheduled out-of-office dates, including during the first two weeks of July, Defendants respectfully request that the Court extend their deadline to

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file an Answer by 30 days, until August 13, 2025, and adjourn the initial case management conference to a date that is convenient for the Court after August 13, 2025.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s

Andrew G. Celli, Jr.

Sam Shapiro

c. All counsel of record, via ECF